



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

REGION 6 SITE NUMBER (to be assigned by HQ)
TX 05436

GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the information on this form to develop a Tentative Disposition (Section II). File this form in its entirety in the regional Hazardous Waste Log File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME THOMAS STEEL DRUM		B. STREET (or other identifier) 2517 N. E. 35th	
C. CITY Ft. Worth	D. STATE TX	E. ZIP CODE	F. COUNTY NAME Tarrant

G. SITE OPERATOR INFORMATION

1. NAME Stan Thomas		2. TELEPHONE NUMBER (817) 838-6891	
3. STREET 2517 N.E. 35th St.	4. CITY Fort Worth, TX	5. STATE TX	6. ZIP CODE

H. REALTY OWNER INFORMATION (if different from operator of site)

1. NAME Curtis Thomas Investments, Inc., 1517 1st Natl Bank Bldg.		2. TELEPHONE NUMBER (817) 336-5569	
3. CITY Ft. Worth	4. STATE TX	5. ZIP CODE	

I. SITE DESCRIPTION Firm reconditions steel drums by incineration of residue, followed by sandblasting and painting.

J. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE

II. TENTATIVE DISPOSITION (complete this section last)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (mo., day, & yr.)	B. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input checked="" type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE
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C. PREPARER INFORMATION

1. NAME Barry Nash	2. TELEPHONE NUMBER 742-4521	3. DATE (mo., day, & yr.) Jan. 27, 1981
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III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION	
1. NAME Barry Nash	2. TITLE FIT-Environmental Scientist
3. ORGANIZATION Ecology & Environment, Inc.	4. TELEPHONE NO. (area code & no.) (214) 742-4521

B. INSPECTION PARTICIPANTS

1. NAME	2. ORGANIZATION	3. TELEPHONE NO.
John Acardi	EPA	767-2724
Joe Stankiewicz	EPA	" "
Gordon Duncan	Ecology & Environment, Inc.	742-4521
Glen Thomas	Tex. Dept. of Water Resources	(214) 298-6171

C. SITE REPRESENTATIVES INTERVIEWED (corporate officials, workers, residents)

1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
Stan Thomas	Plant Mgr. (817) 838-6891	2517 N.E. 35th St., Ft. Worth, TX

90068258



III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (source of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED
See Attachment "A"			

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED
Thomas Steel Drum	(817) 838-6891	2517 N.E. 35th St., Ft. Worth, TX.	UNKNOWN
See Attachment "A"			

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS
County Landfill		Airport Highway, Ft. Worth, TX - Disposal of ash from incineration

G. DATE OF INSPECTION

1/20/81

H. TIME OF INSPECTION

0930-1230

I. ACCESS GAINED BY: (credentials must be shown in all cases)

☒ 1. PERMISSION☐ 2. WARRANT

J. WEATHER (describe)

45°, overcast, light northerly winds

IV. SAMPLING INFORMATION

A. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO:	4. DATE RESULTS AVAILABLE
A. GROUNDWATER			
B. SURFACE WATER			
C. WASTE			
D. AIR			
E. RUNOFF	X	Houston	
F. SPILL			
G. SOIL			
H. VEGETATION			
I. OTHER (specify)			

On site sampling not recommended

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS
Radioactivity	Continuous Monitoring	No levels above background

Continued From Page 2

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS

☒ a. GROUND ☐ b. AERIAL

2. PHOTOS IN CUSTODY OF: EPA VI - See Attachment

D. SITE MAPPED?

☒ YES. SPECIFY LOCATION OF MAPS: USGS Map-Halton City Quadrangle. See attachments.

E. COORDINATES

1. LATITUDE (deg.-min.-sec.)

32° 48' 50" N

2. LONGITUDE (deg.-min.-sec.)

97° 18' 8" W

V. SITE INFORMATION

A. SITE STATUS

☒ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)☐ 2. INACTIVE (Those sites which no longer receive wastes.)☐ 3. OTHER (specify):
(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

☒ 1. NO ☐ 2. YES (specify generator's four-digit SIC Code):

C. AREA OF SITE (in acres)

3 Acres

D. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☒ 2. YES (specify): Office, storage, receiving and furnace buildings.

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

<input checked="" type="checkbox"/> A. TRANSPORTER	<input type="checkbox"/> B. STORER	<input type="checkbox"/> C. TREATER	<input type="checkbox"/> D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	2. LANDFARM
3. BARGE	3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
<input checked="" type="checkbox"/> 4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS./TREATMENT	5. MIDNIGHT DUMPING
<input checked="" type="checkbox"/> 6. OTHER (specify): Thomas Steel Drum has their own trucks.	<input checked="" type="checkbox"/> 6. OTHER (specify): Empty drums with residue are stored on property until incinerated. There are 3000 to 5000 "raw" drums on-site.	6. BIOLOGICAL TREATMENT	<input checked="" type="checkbox"/> 6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		9. OTHER (specify):	

E. SUPPLEMENTAL REPORTS: If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

☐ 1. STORAGE ☒ 2. INCINERATION ☐ 3. LANDFILL ☐ 4. SURFACE IMPOUNDMENT ☐ 5. DEEP WELL

☐ 6. CHEM/BIO/PHYS TREATMENT ☐ 7. LANDFARM ☐ 8. OPEN DUMP ☐ 9. TRANSPORTER ☐ 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

☒ 1. LIQUID ☐ 2. SOLID ☒ 3. SLUDGE ☐ 4. GAS

B. WASTE CHARACTERISTICS

☒ 1. CORROSIVE ☒ 2. IGNITABLE ☐ 3. RADIOACTIVE ☐ 4. HIGHLY VOLATILE

☒ 5. TOXIC ☐ 6. REACTIVE ☐ 7. INERT ☒ 8. FLAMMABLE

☐ 9. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below. Records of waste were kept. Only receipts which indicate the sources of drums were retained.

Continued From Front

VII. WASTE RELATED INFORMATION (continued)

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

1. SLUDGE	2. OIL	3. SOLVENTS	4. CHEMICALS	5. SOLIDS	6. OTHER
AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT
UNKNOWN		UNKNOWN	UNKNOWN		UNKNOWN
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY, PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	<input checked="" type="checkbox"/> (2) NON-HALOGENATED SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	<input checked="" type="checkbox"/> (2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMELTING WASTES	(4) MUNICIPAL
<input checked="" type="checkbox"/> (5) OTHER (specify): See Attachment "A"			<input checked="" type="checkbox"/> (5) DYES/INKS	(5) NON-FERROUS SMELTING WASTES	<input checked="" type="checkbox"/> (5) OTHER (specify): Food Products
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			<input checked="" type="checkbox"/> (11) OTHER (specify): Resins		

C. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X')				3. TOXICITY (mark 'X')				4. CAS NUMBER	5. AMOUNT	6. UNIT
	S. SOLID	L. LIQ.	C. POW	P. PASTE	4. HIGH	5. MED	6. LOW	7. NONE			
See Attachment "A"											

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

☐ A. HUMAN HEALTH HAZARDS

VIII. HAZARD DESCRIPTION (continued)

☐ B. NON-WORKER INJURY/EXPOSURE☒ C. WORKER INJURY/EXPOSURE

Offloaded drums were observed to be cut open by workers with no respiratory protection. Drums marked "Dangerous when Empty" were opened and handled in an enclosed building by workers who were smoking.

The drum painting was also observed. There appeared to be no means of respiratory protection for the workers.

☐ D. CONTAMINATION OF WATER SUPPLY☐ E. CONTAMINATION OF FOOD CHAIN☐ F. CONTAMINATION OF GROUND WATER☐ G. CONTAMINATION OF SURFACE WATER

VIII. HAZARD DESCRIPTION (continued)

☐ H. DAMAGE TO FLORA/FAUNA☐ I. FISH KILL☒ J. CONTAMINATION OF AIR

During the inspection dense clouds of black smoke were seen intermitted. In the past, the Texas Air Control Board has fined the company several times for infractions.

☒ K. NOTICEABLE ODORS

No odors were noticed while off-site during the day of the site inspection. However, several citizens complaints have been received by the Texas Air Control Board, and strong odors were associated with certain drums on-site.

☒ L. CONTAMINATION OF SOIL

Soil on-site is heavily stained.

☐ M. PROPERTY DAMAGE

VIII. HAZARD DESCRIPTION (continued)

☐ N. FIRE OR EXPLOSION☒ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID

Barrels with some residue remaining are stored on-site; many with drum heads removed. Residue can drip to ground. Most of the residue is paint or resin, consequently little reaches the ground. There are approximately 3000 drums stored on-site.

See photo 11-13, 15, 16

☒ P. SEWER, STORM DRAIN PROBLEMS

The cooling water used on the conveyor belts, along with residue dripping from drums, is collected and, according to Stan Thomas, passed through a sand pit filter prior to entering the city sewer system.

☐ Q. EROSION PROBLEMS☒ R. INADEQUATE SECURITY

Site is fenced with barbed-wire. Access is available to individuals through some breaches in the fence. A television monitoring system is to be installed in the future.

☐ S. INCOMPATIBLE WASTES

VIII. HAZARD DESCRIPTION (continued)

☐ 7. MIDNIGHT DUMPING

☒ 8. OTHER (specify):

Primary problems seem to be air pollution due to inadequate facilities to completely combust residue and insufficient draft to clear away emissions. While minor spills were observed on-site, quantities were generally quite limited. The Texas Air Control Board is well aware of the site, and OSHA has been notified of possible hazards to workmen.

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS	1000	1000	250	1 Mile
2. IN COMMERCIAL OR INDUSTRIAL AREAS	500	500	50	1 Mile
3. IN PUBLICLY TRAVELLED AREAS	100,000	100,000	0	1 Mile
4. PUBLIC USE AREAS (parks, schools, etc.)	1000	1000	5	1 Mile

X. WATER AND HYDROLOGICAL DATA

1. DEPTH TO GROUNDWATER (specify unit) 19 Feet	2. DIRECTION OF FLOW South	3. GROUNDWATER USE IN VICINITY None
4. POTENTIAL YIELD OF AQUIFER 80 gpm	5. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure) 6 miles to Lake Worth	6. DIRECTION TO DRINKING WATER SUPPLY West
7. TYPE OF DRINKING WATER SUPPLY		
<input type="checkbox"/> 1. NON-COMMUNITY < 15 CONNECTIONS	<input checked="" type="checkbox"/> 2. COMMUNITY (specify town): Ft. Worth, TX Water Supply > 15 CONNECTIONS	
<input checked="" type="checkbox"/> 3. SURFACE WATER	<input type="checkbox"/> 4. WELL	

Continued From Page 8

X. WATER AND HYDROLOGICAL DATA (continued)**H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE**

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COM- MUNITY (mark 'X')	5. COMMUN- ITY (mark 'X')
		NONE		

I. RECEIVING WATER**1. NAME**

Trinity River

☐ 2. SEWERS☒ 3. STREAMS/RIVERS☐ 4. LAKES/RESERVOIRS☐ 5. OTHER (specify):**6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS**

Noncontact recreation, fish & wildlife propagation.

XI. SOIL AND VEGETATION DATA**LOCATION OF SITE IS IN:**☐ A. KNOWN FAULT ZONE☐ B. KARST ZONE☐ C. 100 YEAR FLOOD PLAIN☐ D. WETLAND☐ E. A REGULATED FLOODWAY☐ F. CRITICAL HABITAT☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER**XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED**

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

<input checked="" type="checkbox"/> A. OVERBURDEN	<input checked="" type="checkbox"/> B. BEDROCK (specify below)	<input checked="" type="checkbox"/> C. OTHER (specify below)
1. SAND		
<input checked="" type="checkbox"/> 2. CLAY		<input checked="" type="checkbox"/> Ft. Worth Limestone
3. GRAVEL		

XIII. SOIL PERMEABILITY☐ A. UNKNOWN☐ B. VERY HIGH (100,000 to 1000 cm/sec.)☐ C. HIGH (1000 to 10 cm/sec.)☐ D. MODERATE (10 to .1 cm/sec.)☐ E. LOW (.1 to .001 cm/sec.)☒ F. VERY LOW (.001 to .00001 cm/sec.)**G. RECHARGE AREA**☐ 1. YES☒ 2. NO

3. COMMENTS:

H. DISCHARGE AREA☐ 1. YES☒ 2. NO

3. COMMENTS:

I. SLOPE**1. ESTIMATE % OF SLOPE**

1° Slope

2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.

Slopes down to SW

J. OTHER GEOLOGICAL DATA

Site is on the Fort Worth limestone, a lower cretaceous unit of limestone and clay. It weathers to form low rolling hills and is 25 to 35 feet thick.

XIV. PERMIT INFORMATION

List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X')		
					1. YES	2. NO	3. UN- KNOWN
TDWR Registration	TWQB	30385	4/20/76	None	X		

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS

☐ NONE ☒ YES (summarize in this space)

The Texas Air Control Board has received several citizens complaints and had several problems with Thomas Steel Drum. Enforcement cases were difficult to prosecute, and the company generally chose to pay fines rather than appear in court.

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition (Section II) information on the first page of this form.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-3.

Corresponding
number on form

Additional Remark and/or Explanation

III, D

Thomas Steel Drum does not retain a list of suppliers or waste types. The following is a partial list compiled by the Texas Air Control Board:

American Mfg., 3300 N. Sylvania, Ft. Worth, TX
(817)838-2301, Oil Well Paints
Allied General Motors, soundproofing
Carroll C., 2900 W. Kingsley Rd., Garland, TX (214)278-1304
Cook Paint & Varnish, Arlington, TX
Composite Technology, epoxy
Dowell Chemical, P.O. Box 21, Tulsa, OK (918)560-2600
H. B. Fuller, 3434 Executive Blvd., Dallas, TX, 288-7448
Fiber Trend, 410 E. Red Bird Ln., Duncanville, TX
(214)296-1055
General Motors, (817)649-6211, Soundproofing
Glidden, Dirkee, Dallas, TX, paints
Haliburton Services, OK
Lone Star Paint, 909 Millard Dr., Henderson, TX (214)657-4588
Livingstone Armadillo, Owentown
Lambert Southwest, paint
3M, Brady Hwy., Box 1669, Brownwood, TX, (915)646-3551
J. G. Millican, paint
Omega Coatings, 801 E. Loop 340, Waco, TX, (817)799-5505
Pecora, 2601 Oakland Ave., Garland, TX, (214)278-8158
Quadrant Chemical, 200 Industrial Blvd., McKinney, TX
(214)542-0072
Reliable Coatings, enamel paints
Southwest Steel Cont., 3301 S. Lamar, Dallas, TX,
(214)421-7161
Sinclair & Valentine, 3421 Roaylty Row, Irving, TX.
(214)438-1262
Surecoat Paints, Hwy. 69S, Jacksonville, TX (214)586-1571
Sinclair-Moorehead, Irving, paint
Technical Coatings, Clovis Rd. & Quaker, Lubbock, TX
(806)762-0871, paint
Trinity Industries, W. Harrison Rd., Longview, TX
(214)759-9471
Texas Highway Dept., highway paint
U. M. Abrasives, 831 Trent St., Kennedale, (817)572-1344
Western Specialties Coatings, 1450 Ave. R, Grand Prairie, TX
(214)647-8050

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-3.

Corresponding
number on form

Additional Remark and/or Explanation

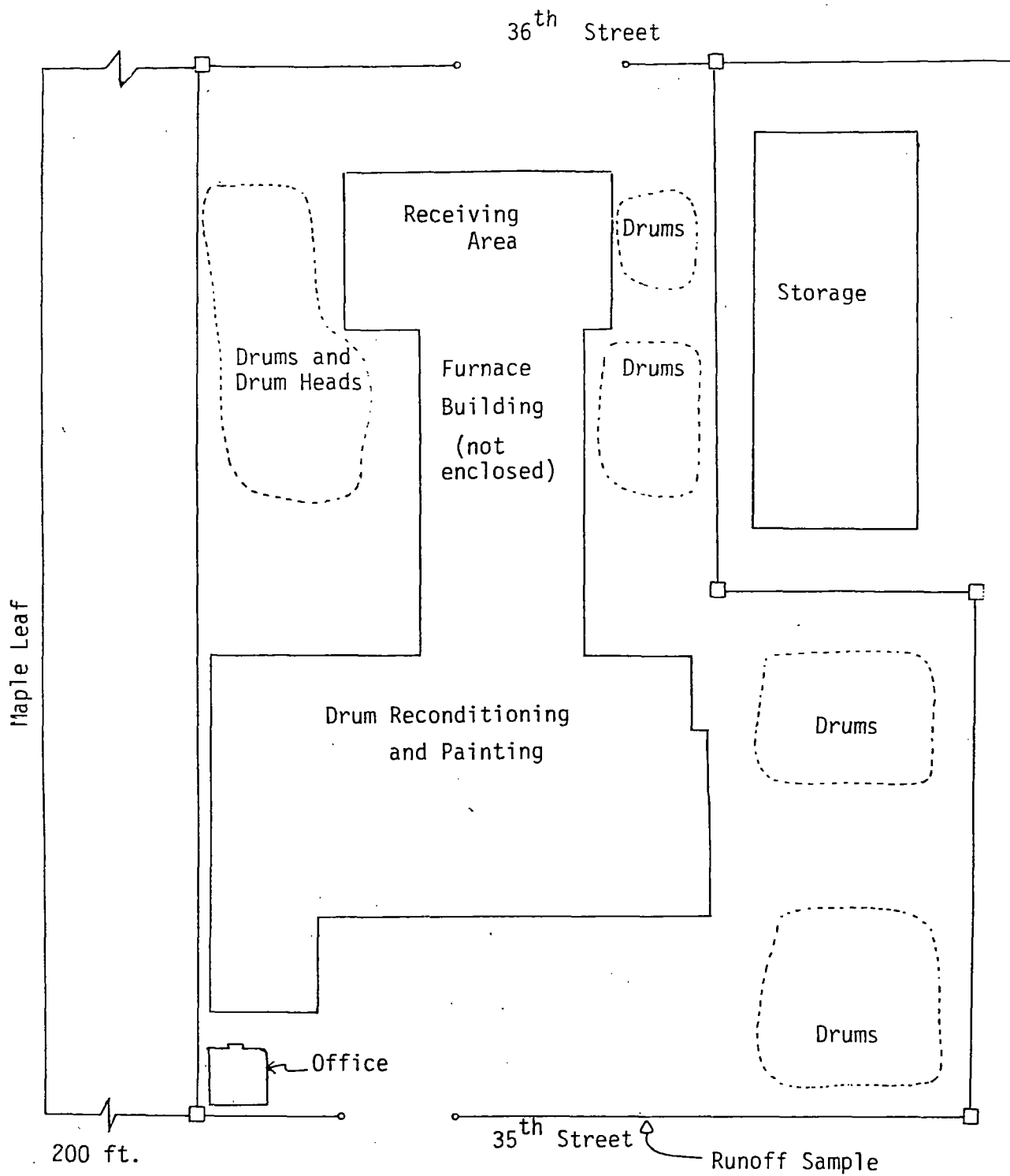
III, E

Thomas Steel Drum uses their own trucks for transportation of drums. Occasionally clients do bring drums in their own trucks.

VII, 2

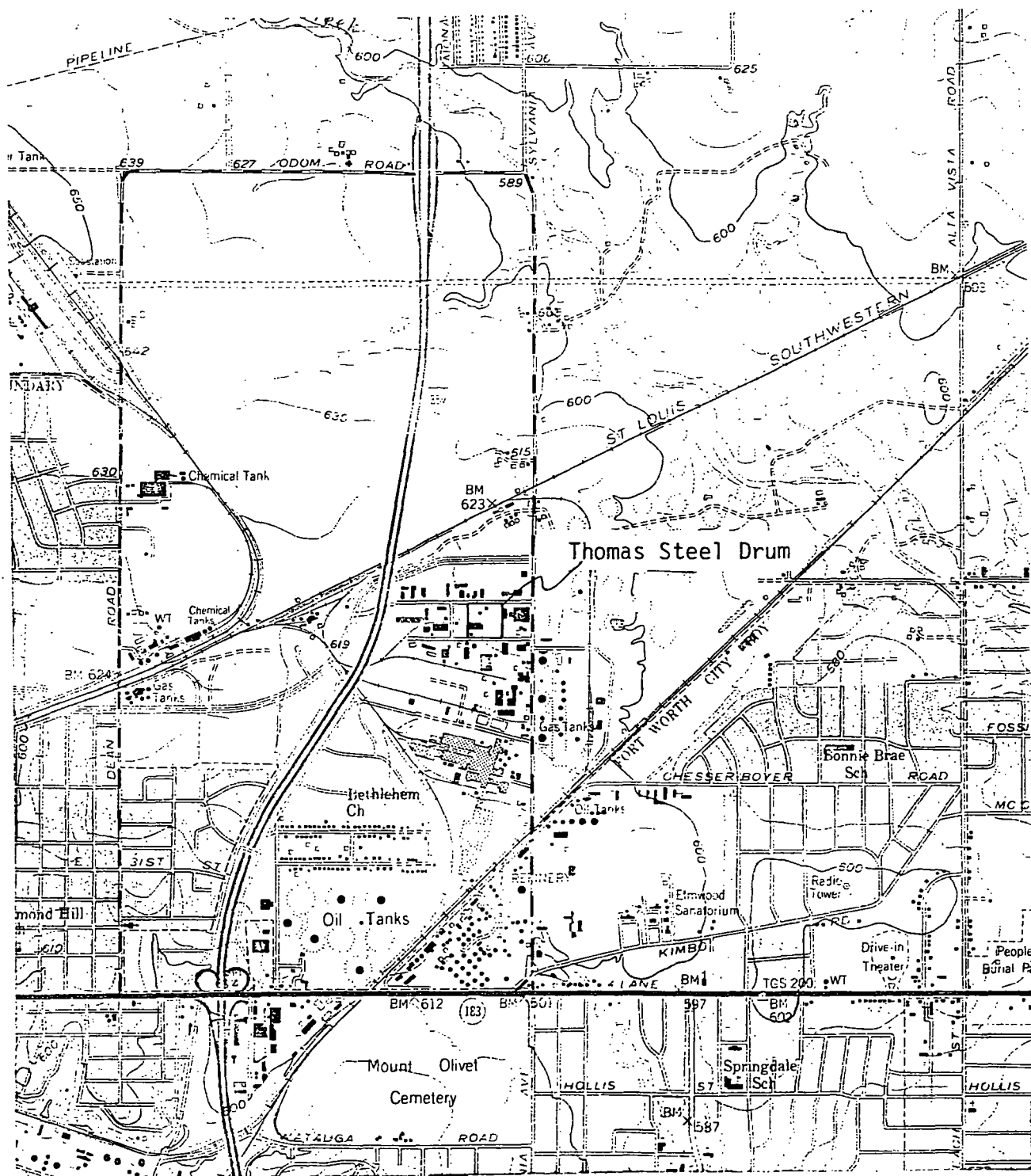
Due to the variety of contractors and the lack of any manifest system, the type and quantity of wastes present at the site cannot be determined. A survey of drum labels while on-site revealed materials such as copolymer resins, acrylate monomers, trichloroethane and paint residue. The presence of other nonhalogenated solvents, dyes, hospital wastes and food wastes was also indicated by occasional drums.

An estimate of the amount of wastes processed can be made assuming a residue covering the bottom of a drum to 1/8th of an inch. At the density of water, and using a rate of 600 drums cleaned per day, approximately 22,000 kg of wastes are disposed of each month. The amount of material which may be hazardous cannot be estimated with available information. According to plant representative, Stan Thomas, the company no longer accepts hazardous waste. However, there are no criteria for distinguishing these materials, and up to one year ago, pesticides were still being accepted.



THOMAS STEEL DRUM

scale: 1" = 60'



THOMAS STEEL DRUM

from

USGS map Haltom City Quadrangle

contour interval 10 feet

scale 1:24000

INCINERATORS SITE INSPECTION REPORT
(Supplemental Report)

INSTRUCTION

Answer and Explain
as Necessary.

1. INCINERATION OF ALL SUBSTANCES APPROVED BY REGULATORY AGENCY

☐ YES ☒ NO

LIST ALL SUBSTANCES INCINERATED, INDICATING WHETHER OR NOT APPROVAL EXISTS.

Thomas Steel Drum does not retain a list of substances which go into the incinerator. The materials which are most often disposed of are paints, adhesives, printers ink, resins and solvents.

2. COMBUSTION EFFICIENCY MONITORED

☐ YES ☒ NO (Explain)

Drums are fed through incinerator on a conveyor belt. Those whose contents are not completely combusted are run through again.

3. TEMPERATURE, GAS FLOW, RETENTION CALCULATIONS, AND COMBUSTION ZONE MONITORED

☐ YES ☒ NO Temperature approximately 900°F.

4. MONITORING EQUIPMENT FUNCTIONING PROPERLY

☐ YES ☐ NO Not applicable.

5. ADEQUATE MAINTENANCE OF EMISSION CONTROL EQUIPMENT

☒ YES ☐ NO 3 afterburners at 1600°F are the only emission controls.

6. MONITORING PORTS IN INCINERATOR (Indicate Position)

☐ YES ☒ NO

7. WASTE FLOW RATE MONITORED

☒ YES ☐ NO Operator judges flow rate based on density of smoke emitted.

8. CUT-OFF DEVICE FUNCTIONING PROPERLY

☐ YES ☐ NO Not applicable

9. STACK TEST

☐ YES ☒ NO

9a. EPA METHOD

9b. AGENCY CONDUCTING TEST

9c. DATE

10. ADEQUATE METHOD FOR DISPOSAL OF SCRUBBER LIQUOR WASTEWATER (Describe)

☐ YES ☐ NO Not applicable

11. ADEQUATE METHOD FOR DISPOSAL OF ASH QUENCHING WASTEWATER OR ASH (Describe)

☒ YES ☐ NO Disposal of county landfill on airport highway. Ash is inert, /according to Stan Thomas.

12. TYPE OF SCRUBBER MEDIUM

NONE

13. TYPE OF SCRUBBER

NONE

14. MIST ELIMINATOR

☐ YES ☒ NO

15. OPACITY READING TAKEN

☐ YES ☒ NO VALUE:

16. WET STACK

☐ YES ☒ NO

17. STACK HEIGHT

Approximately 35 feet

18. STACK DIAMETER

Unknown

19. CONSTRUCTION MATERIAL OF STACK

Steel

20. PERMIT LIMITS

Not permitted.

EMISSION LIMITS

21. TYPE OF EQUIPMENT

Unknown

21a. MAKE

21b. AGE

21c. CONDITION

STORAGE FACILITIES SITE INSPECTION REPORT
(Supplemental Report)

INSTRUCTION
Answer and Explain
as Necessary.

1. STORAGE AREA HAS CONTINUOUS IMPERVIOUS BASE

☐ YES ☒ NO

2. STORAGE AREA HAS A CONFINEMENT STRUCTURE

☐ YES ☒ NO

3. EVIDENCE OF LEAKAGE/OVERFLOW (If "Yes", document where and how much runoff is overflowing or leaking from containment)

☒ YES ☐ NO Drums are stored on their sides; material contained in them may leak. Much of the material is of such a consistency that little reaches the ground.

4. ESTIMATE TYPE AND NUMBER OF BARRELS/CONTAINERS

Approximately 3000 55 gallon drums.

5. GLASS OR PLASTIC STORAGE CONTAINERS USED

☐ YES ☒ NO

6. ESTIMATE NUMBER AND CAPACITY OF STORAGE TANKS

N/A

7. NOTE LABELING ON CONTAINERS

A wide variety of labels were seen at the site.

Indopol Polybutene, Trichloroethane

See photos 3,4, & 14

8. EVIDENCE OF LEAKAGE CORROSION OR BULGING OF BARRELS/CONTAINERS/STORAGE TANKS (If "Yes", document evidence. Describe location and extent of damage. Take PHOTOGRAPHS)

☒ YES ☐ NO Containers are stored opened and on their sides. Some drums are rusted. These contain very little waste material.

See photos 9-10, 11-13, 15

9. DIRECT VENTING OF STORAGE TANKS

☐ YES ☒ NO

10. CONTAINERS HOLDING INCOMPATIBLE SUBSTANCES (If "Yes", document evidence. Describe location and identity of hazardous waste. Take PHOTOGRAPHS.)

☐ YES ☒ NO

11. INCOMPATIBLE SUBSTANCES STORED IN CLOSE PROXIMITY (If "Yes", document evidence. Describe location and identity of hazardous waste. Take PHOTOGRAPHS.)

☐ YES ☒ NO

12. ADEQUATE CONTAINER WASHING AND REUSE PRACTICES

☐ YES ☐ NO

Site reconditions empty drums.

13. ADEQUATE PRACTICES FOR DISPOSAL OF EMPTY STORAGE CONTAINERS

☐ YES ☐ NO

Site reconditions empty drums.



PHOTO 1
Photographer / Witness

Barry Nash / Gordon Duncan

Date / Time / Direction

1/20/81 / 1145 / NE

Comments: Inverted drums on
conveyor belt to furnace. Note
spills from drums and belt
wash down water



PHOTO 2

Photographer / Witness

Barry Nash / Gordon Duncan

Date / Time / Direction

1-20-81 / 1145 / SE

Comments: Furnace and conveyor
exit.



PHOTO 3

Photographer / Witness

Barry Nash / Gordon Duncan

Date / Time / Direction

1-20-81 / 1150

Comments: "Hazardous waste"
drum in receiving building.
Drum was virtually empty,
with little or no residue
remaining.

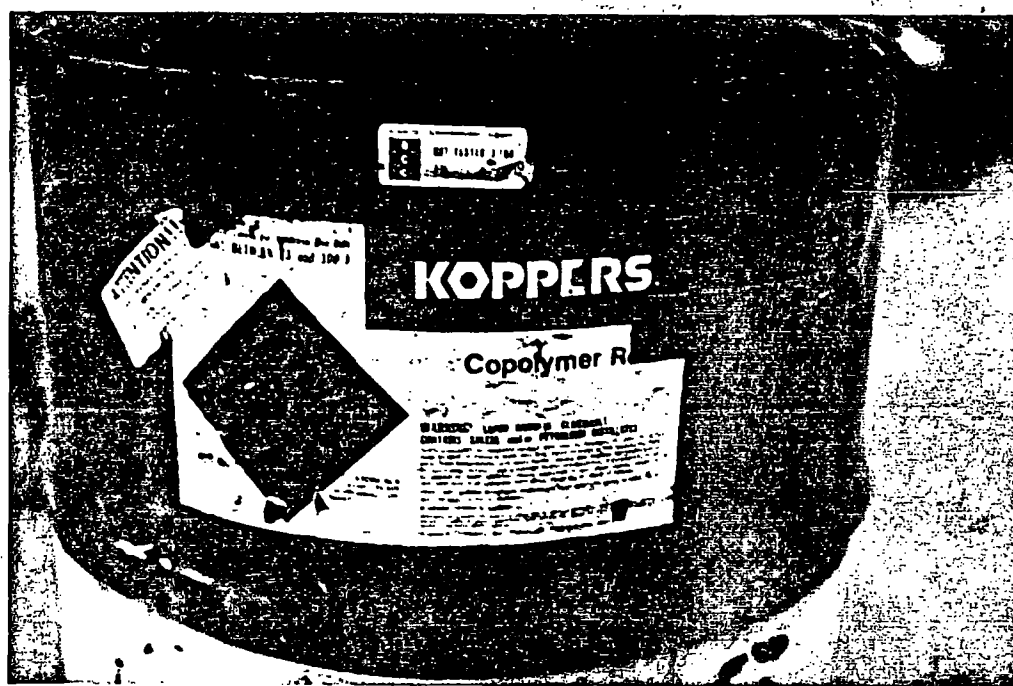


PHOTO 4

(PHOTO 5 & 6 NOT INCLUDED
DUE TO POOR QUALITY)

PHOTO 7-8



Photographer / Witness

Barry Nash / Gordon Thomas

Date / Time / Direction

1-20-81 / 1205

Comments: Drum label. Drum
had residue in it to a
depth of approximately 1/4
inch.

Photographer / Witness

Barry Nash / Gordon Thomas

Date / Time / Direction

1-20-81 / 1215 / NE

Comments: Furnace exit. Water drain
through sand pit filter to city sewer
according to Stan Thomas.

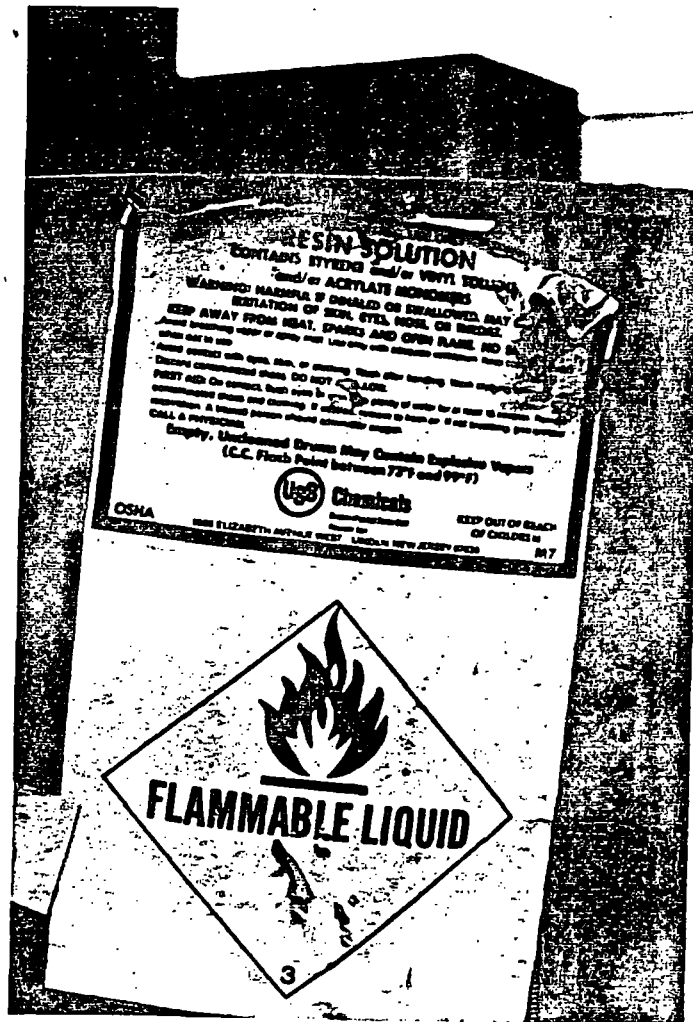


PHOTO 14

Photographer / Witness

Barry Nash / Gordon Duncan

Date / Time / Direction

1-20-81 / 1235

Comments: Drum label, SE
portion of plant

Photographer / Witness

Barry Nash / Gordon Duncan

Date / Time / Direction

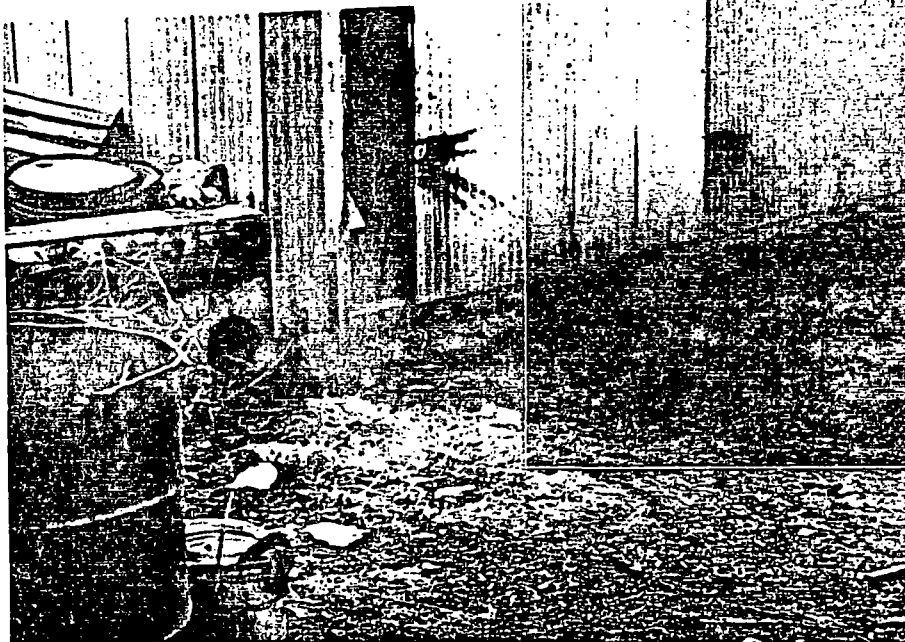
1-20-81 / 1235

Comments: Drum stored on site
prior to incineration. Contains
resin from GM plant

PHOTO 15



PHOTO 9-10



Photographer / Witness

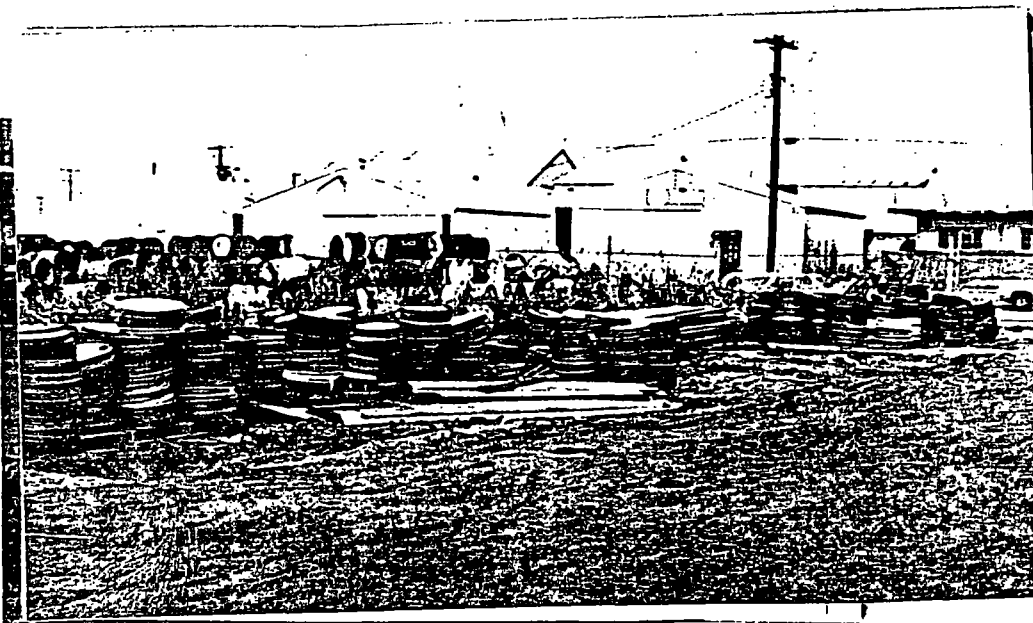
Barry Nash / Gordon Runcan

Date / Time / Direction

1-20-81 / 1220 / NW

Comments: Drainage from
building roof.

PHOTO 11-13



Photographer / Witness

Barry Nash / Gordon Runcan

Date / Time / Direction

1-20-81 / 1230 / NE

Comments: Panorama of
"back lot" showing
stored drums and
drum heads

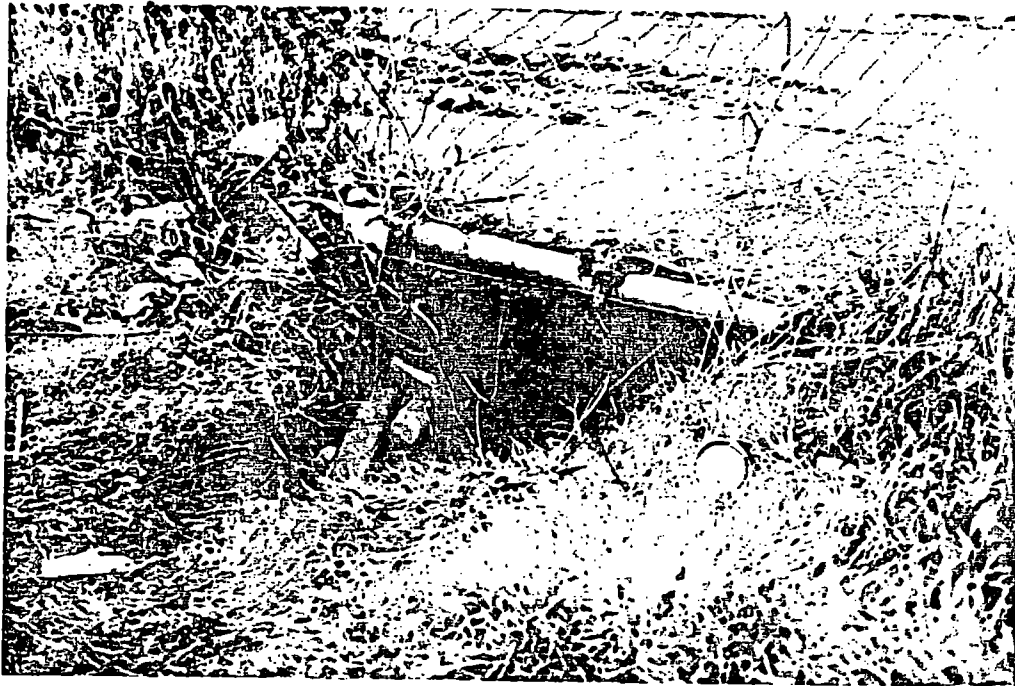


PHOTO 16

Photographer / Witness

Barry Nader / Gordon Kuncan

Date / Time / Direction

1-20-81 / 1238

Comments: Drainage from site
on south side. Sample
taken here.

Photographer / Witness

Date / Time / Direction

Comments:

Photographer / Witness

Date / Time / Direction

Comments:

Region VI
Ecology and Environment, Inc.
MEMORANDUM

TO: Charles Gazda, Chief
Compliance Section, EPA Region VI

FROM: Barry Nash, FIT *Barry Nash*
E&E

THRU: K.H. Malone, Jr., FITL *KHm*

DATE: December 19, 1980

RE: Thomas Steel Drum, TDD 068011-23

The FIT was directed to conduct an on site recon inspection of Thomas Steel Drum, Ft. Worth. On December 4, at approximately 1500, the FIT representative phoned Thomas Steel Drum. It was determined that Jim Boase, listed in the Preliminary Assessment as Plant Manager is no longer employed at Thomas Steel Drum. A request for the Plant Manager produced a connection with an unidentified person. The name may have been Thompson (?). After explaining the general terms of E&E's relationship with the EPA, and the purpose of the call and a visit to the site, the unidentified person interrupted to say that he would not have anything to do with E&E and EPA and that he would give no information out over the phone. He refused to give his name or a definite reason for his refusal to talk with the FIT representative or allow either FIT or EPA personnel on site. He then terminated the conversation.

The above has been discussed with John Accardi, EPA and this TDD is considered completed because of the entry denial.



PLEASE COMPLETE ALL INFORMATION IN THE 5 BLOCKS OUTLINED IN ORANGE
SEE BACK OF FORM SET FOR COMPLETE PREPARATION INSTRUCTIONS.

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0129424304



YOUR FEDERAL EXPRESS ACCOUNT NUMBER
111-111-111

DATE
Jan 21 1981

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Marty Mack FIT

TO (Recipient's Name)
Dr. William B. J. Jr.
If Hold For Pick-Up or Saturday Delivery, Recipient's Phone Number

COMPANY
DEPARTMENT/FLOOR NO.

COMPANY
DEPARTMENT/FLOOR NO.
Houston EPA Laboratory

STREET ADDRESS
6608 Humwood Drive

STREET ADDRESS (P.O. BOX NUMBERS ARE NOT DELIVERABLE)
6608 Humwood Drive

CITY
STATE

CITY
STATE
Houston Texas

AIRBILL NO. 0129424304

ZIP ACCURATE ZIP CODE REQUIRED FOR CORRECT INVOICING
77071

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☐ Cash In Advance Account Number/Credit Card Number: 3347754

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DECLARED VALUE CHARGE

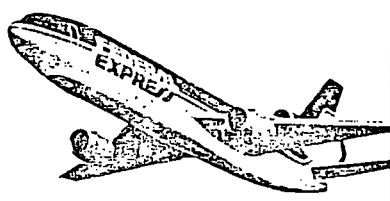
SERVICES
CHECK ONLY ONE BOX
PRIORITY ONE (P-1)
1 ☒ (OVERNIGHT PACKAGES) 6 ☐
COURIER PAK 7 ☐
2 ☐ OVERNIGHT ENVELOPE (up to 7 LBS.) 8 ☐
3 ☐ OVERNIGHT BOX (up to 5 LBS.) 9 ☐
4 ☐ OVERNIGHT TUBE (up to 5 LBS.)
STANDARD AIR
5 ☐ DELIVERY 2ND BUSINESS DAY FOLLOWING PICK UP

DELIVERY AND SPECIAL HANDLING
CHECK SERVICES REQUIRED
1 ☐ HOLD FOR PICK-UP AT FOLLOWING FEDERAL EXPRESS LOCATION SHOWN IN SERVICE GUIDE.
2 ☒ DELIVER
3 ☐ SATURDAY SERVICE REQUIRED (See Reverse if extra charge applies for delivery)
4 ☐ RESTRICTED ARTICLES SERVICE (P-1 and Standard Air Packages only, extra charge)
5 ☐ SSS (Signature Security Service required, extra charge applies)
6 ☐ DRY ICE _____ LBS
7 ☐ OTHER SPECIAL SERVICE _____
8 ☐
9 ☐

PIECES	WEIGHT	DECLARED VALUE	O/S
1	5		
TOTAL	TOTAL	TOTAL	

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OTHER	
TOTAL CHARGES	



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